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*Co. v. Moorer*, 116 Ala. 642, but the better opinion is contrary. *Louisville & N. Ry. Co. v. Logsden's, Admr.*, *supra*.

RAPE—EVIDENCE—SUFFICIENCY.—*STATE V. KATON*, 91 PAC. (WASH.) 250. There was practically no direct evidence in favor of the prosecution, and the prosecutrix on the cross-examination admitted that the defendant was not the father of her child. *Held*, that the conviction for rape of a female under the age of consent will be upheld, notwithstanding the impeachment of the prosecutrix by her own conduct and admissions, and the testimony of other witnesses. Root, J., *dissenting*.

The jury can convict for rape on the uncorroborated testimony of the injured party. *Bishop's Crim. Proc.* 3d edition, section 968; *State v. Fetterly*, 33 Wash. 599; *People v. Mayes*, 66 Cal. 597; *State v. Lattin*, 29 Conn. 389; *Bennett v. State*, 83 Ala. 40, and it is so held in ten other states. The jury should be cautioned against conviction on the testimony of the prosecutrix alone, uncorroborated by other testimony or by direct circumstances. *People v. Benson*, 6 Cal. 221. Statute requires that the testimony of the prosecutrix must be corroborated. *State v. Bartlett*, 127 Io. 689. And likewise in several other states, although not regulated by statute. *Davis v. State*, 120 Ga. 433. As a general rule, the reputation of the prosecutrix for chastity may be impeached, but not by proof of particular instances of unchastity. *Shirwin v. People*, 69 Ill. 55; *McQuirk v. State*, 84 Ala. 435; *Rice v. State*, 35 Fla. 236. In Vermont, particular instances of unchastity may be shown. *State v. Reed*, 39 Vt. 417. Where crime charged is rape on a female child under the age of consent, testimony as to her general reputation for chastity is not admissible. *State v. Hilberg*, 22 Utah 27; *Plunkett v. State*, 72 Ark. 409; *State v. Whitesell*, 142 Mo. 467. But to refute corroborative evidence it may be shown that the prosecutrix has had intercourse with certain other men. *People v. Flaherty*, 29 N. Y. Sup. 641.

SHIPPING—DUTY OF STEAMERS WITH RESPECT TO SWELL—STRUCTURES AT DOCK, *JAMES SHEWAN V. NEW ENG. NAVIGATION CO.*, 155 FED. 860.—*Held*, the duty of a passing steamer with respect to causing dangerous swells is the same toward a floating dry dock permanently located alongside of a pier as toward vessels in the same situation, and she is bound to exercise reasonable care to avoid causing injury to such dock, having regard to the character of the structure and its greater liability to injury from its size, and therefore, longer subjection to the action of the swells; and it is also the duty of the owner of the dock to take into account the same liability to injury from swells and to make reasonable provisions against it.

TRADE UNIONS—STRIKES—INJUNCTIONS.—*SEARLE MFG. CO. V. TERRY ET AL.*, 106 N. Y. SUPP. 438.—*Held*, that an injunction against striking members of a labor union will not be granted so as to prevent defendants from peacefully picketing, in reasonable numbers for the purpose of observation only, the premises of their former employer from the highways or streets in the vicinity of the employer's place of business and endeavoring, by argument, persuasion or appeal only, to prevent other persons from becoming employees.

The narrow doctrine, which is still held in a number of states, is that picketing by a labor organization in a strike, in and of itself, when properly conducted, is lawful, but when accompanied by violence or any manner of